

Code of Conduct on Corporate Social Responsibility

Preamble

The Lindy Group and its member companies affirm their Corporate Social Responsibility (CSR) as an integral part of their global business operations. This Code of Conduct (hereinafter referred to as 'CoC') outlines the principles guiding our approach, focusing on areas such as working conditions, environmental sustainability, social responsibility, transparency, fostering trust through cooperation and dialogue. Developed and agreed to by the German Central Association of the Electrical and Electronics Industry (ZVEI) and its member companies, the content of this CoC reflects the core values of ZVEI, as articulated in its vision and mission statements and strongly aligns with the principles of a social market economy.

1. Basic Understanding of Social Responsibility in Corporate Management

A mutual, basic understanding of social responsibility in corporate management forms the foundation of this CoC. This means Lindy assumes responsibility by considering the consequences of its business decisions and actions on economic, technological, social and environmental levels and brings about an appropriate balance of interests. Lindy is committed to contributing to the well-being and long-term development of a global society at every point it can and in the locations where it is in business. This commitment is rooted in universally recognized ethical values and principles, including integrity, honesty and respect of human dignity.

2. Where the CSR applies

2.1 This COC is in effect for all Lindy Group companies and business units worldwide.

2.2 Lindy commits to promoting and requiring adherence to the content of this CoC at every point it can for its suppliers and in other parts of the value chain.

3. Core Values for Social Responsibility in Corporate Management

Lindy will proactively work to ensure that the values mentioned below are put into practice and adhered to, both now and in the future.

3.1 Adherence to Laws

Lindy will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the company will carefully examine what good company practices from their home country should be applied to enable supportive, responsible company management.

3.2 Integrity and Organizational Governance

3.2.1 Lindy gears its activities towards universally held ethical values and principles, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.

3.2.2 Lindy rejects corruption and bribery as stated in the relevant UN Convention. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

3.2.3 Lindy pursues clean and recognized business practices and fair competition. In regard to competition, it focuses on professional behaviour and high standards of quality for work. It fosters partnership and trusting interaction with the supervisory authorities.

3.3 Consumer Interests to the extent consumer interests are affected, Lindy abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

3.4 Communication

Lindy will communicate in an open way and is oriented towards dialogue about the requirements of this CoC and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly changed or destroyed. They will be properly stored. Confidential company information and partner's business information will be handled sensitively and will be kept in confidence.

3.5 Human Rights

Lindy is committed to promoting human rights. It respects human rights stated in the Charter of the United Nations, especially those named in the following:

3.5.1 Privacy

Protection of privacy.

3.5.2 Health and Safety

Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.

3.5.3 Harassment

Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.5.4 Freedom of Conscience

Protection and guarantee of the right to freedom of conscience and freedom of expression.

3.6 Working Conditions

Lindy abides by the following core work standards from ILO (International Labour Organisation):

3.6.1 Child Labour

The prohibition of child labour, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted.

3.6.2 Forced Labour

The prohibition of forced labour of any kind.

Lindy rejects forced labour in any form and implement strict due diligence to ensure, to the greatest extent possible, that there is no forced labour in our operations or supply chains, particularly as defined by the Uyghur Forced Labor Prevention Act (UFLPA).

3.6.3 Wage Compensation

Work standards concerning compensation, especially in regard to the level of compensation as stated in the laws and requirements that are in force.

3.6.4 Employee Rights

Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country.

3.6.5 Prohibition of Discrimination

Treatment of all employees in a non-discriminatory fashion.

3.7 Hours of Work

Lindy abides by work standards concerning the longest permitted time of work.

3.8 Civic Commitment

Lindy contributes to the social and economic development of the countries and regions where it is in business and promotes appropriate, volunteer activities information by its employees.

3.8 Environmental Protection

Lindy acts in accordance with the applicable laws that affect its respective operations and products and is guided by international standards to minimize negative impacts on the environment and continuously improve our environmental and climate protection activities.

3.10 Handling Conflict Minerals

Lindy is committed to ethical sourcing practices in accordance with the standards of the Responsible Minerals Initiative. The company ensures transparency and accountability in the sourcing of minerals, avoids conflict areas and adheres to the principles of sustainability.

3.11 Responsible Sourcing

Lindy is committed to responsible sourcing and compliance with international regulations, including the UFLPA and the standards of the Responsible Minerals Initiative. These efforts are consistent with our adherence to the ZVEI Code of Conduct, which ensures the protection of human rights and ethical practices in the supply chain.

4. Implementation and Application

Lindy will make every appropriate and reasonable effort to implement and to apply the principles and values described in this CoC both now and in the future.

The CoC is valid in its current version (published on www.lindy.com). Lindy reserves the right to amend the CoC and to adapt and interpret it accordingly in the event of changes to laws, customs or other standards.

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